

1 Presented to the Court by the foreman of the
2 Grand Jury in open Court, in the presence of
3 the Grand Jury and FILED in the U.S.
4 DISTRICT COURT at Seattle, Washington.

3 March 26 2025
4 By Ravi Subramanian, Clerk
By Angela R. Hunt Deputy

7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA

10 UNITED STATES OF AMERICA,
11 Plaintiff

NO. **CR 25-5077 DGE**
INDICTMENT

13 v.
14 JEFFREY FABIANI,
15 Defendant.

17 The Grand Jury charges that:

19 **COUNT 1**

20 **(Attempted Production of Child Pornography)**

21 Between in or about 2023 and in or about 2024, in Pierce County, within the
22 Western District of Washington and elsewhere, JEFFREY FABIANI attempted to
23 employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually
24 explicit conduct for the purpose of producing any visual depiction of such conduct and
25 for the purpose of transmitting a live visual depiction of such conduct, knowing and
26 having reason to know that such visual depiction will be transported and transmitted
27 using any means and facility of interstate and foreign commerce and in and affecting

1 interstate and foreign commerce and mailed, such visual depiction was produced and
 2 transmitted using materials that have been mailed, shipped, and transported in and
 3 affecting interstate and foreign commerce by any means, including by computer, and
 4 such visual depiction has actually been transported and transmitted using any means and
 5 facility of interstate and foreign commerce and in and affecting interstate and foreign
 6 commerce and mailed.

7 All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

8 **COUNT 2**

9 **(Possession of Child Pornography)**

10 Between not later than in or about March 2022 and in or about March 2025, in
 11 Pierce County, within the Western District of Washington, and elsewhere, JEFFREY
 12 FABIANI knowingly possessed matter that contained any visual depiction, the
 13 production of which involved the use of a minor engaging in sexually explicit conduct
 14 and such visual depiction was of such conduct, that was mailed and shipped and
 15 transported using any means and facility of interstate and foreign commerce and in and
 16 affecting interstate and foreign commerce and that was produced using materials that had
 17 been so mailed and shipped and transported by any means, including by computer, and
 18 any visual depiction involved in the offense involved a prepubescent minor and a minor
 19 who had not attained 12 years of age.

20 All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and
 21 2252(b)(2).

22 **FORFEITURE ALLEGATION**

23 The allegations contained in Counts 1 and 2 of this Indictment are hereby
 24 realleged and incorporated by reference for the purpose of alleging forfeiture. Upon
 25 conviction of an offense alleged in Counts 1 and 2, JEFFREY FABIANI shall forfeit to
 26 the United States, pursuant to Title 18, United States Code, Section 2253(a), all property
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1 used to commit or to facilitate commission of the offenses, any proceeds of the offense,
2 and any data files consisting of or containing visual depictions within the meaning of
3 Title 18, United States Code, Section 2253(a)(1).

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Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL:

DATED: 3/26/2025

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON

TEAL LUTHY MILLER
Acting United States Attorney

TODD GREENBERG
Assistant United States Attorney

MATTHEW P. HAMPTON
Assistant United States Attorney